

**GRIFFIN LLP**

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Scott A. Griffin  
Frank L. Eaton

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re: : Chapter 11  
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JJ ARCH LLC, :  
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:  
Debtor.<sup>1</sup> :  
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**DECLARATION OF SCOTT A. GRIFFIN IN SUPPORT  
OF GRIFFIN LLP'S MOTION TO WITHDRAW AS PROPOSED  
GENERAL BANKRUPTCY COUNSEL FOR DEBTOR JJ ARCH LLC**

I, Scott A. Griffin, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury:

1. I am a partner of the firm Griffin LLP ("Griffin" or the Firm), with offices located at 420 Lexington Ave. Suite 400, New York NY 10170. I am duly admitted to practice law before this Court and the courts of the State of New York.

2. I submit this declaration (the "Declaration") in support of Griffin's motion (the "Motion")<sup>2</sup> to withdraw as General Bankruptcy Counsel for the Debtor.

3. As General Bankruptcy Counsel, Griffin has provided the Debtor with a legal strategy for the administration and prosecution of the Chapter 11 Case.

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<sup>1</sup> The last four digits of the Debtor's federal tax identification number are 4251.

<sup>2</sup> Capitalized terms used herein, but not otherwise defined, shall have the meanings ascribed to them in the Motion.

4. The Debtor, however, does not agree with the proposed strategy, and refuses to follow Griffin's recommendations regarding how best to move this Chapter 11 Case to plan confirmation.

5. Because of this disagreement, the Debtor has refused to cooperate with the strategy recommended by Griffin for administering and prosecuting the Chapter 11 Case, resulting in an irreparable break down in the attorney-client relationship which now prevents the Firm from fulfilling its ethical and fiduciary obligations to the Debtor.

6. Additionally, as result of events occurring in conjunction with the irreparable breakdown of the parties' attorney-client relationship, Griffin is no longer "disinterested" as required under section 327(a) of the Bankruptcy Code to serve as General Bankruptcy Counsel.<sup>3</sup>

7. I do not believe that the Firm's withdrawal would adversely impact the administration and prosecution of the Chapter 11 Case, as the case remains in its early stages as a due to ongoing litigation in the case, with such litigation also being in its preliminary stages.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated June 3, 2024

/s/  
Scott A. Griffin

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<sup>3</sup> In conjunction with its ethical obligations to the Debtor under the New York Rules of Professional Conduct, I have not included details regarding the Firm's disagreement with the Debtor on case strategy or the specific instances demonstrating the irreconcilable break down in the attorney-client relationship.